

Plaintiff United States Securities and Exchange Commission (“SEC”) and defendants John M. Fife (“Fife”), Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants,” and, together with the SEC, “the Parties”), through their respective counsel, jointly and respectfully move the Court to extend the existing stay in this matter from April 21, 2025 to May 9, 2025. In support of their motion, the Parties state as follows:

2. The proposed resolution of this action is subject to the vote of the SEC's Commissioners. The SEC needs a short extension for that agency process to conclude. The

SEC's counsel believes that this process will be completed on or around May 1, 2025.

Accordingly, on or before May 9, 2025, the Parties will file documents reflecting the agreed resolution of this matter or will submit a joint status report. The Parties therefore respectfully request an extension of the stay, up to and including May 9, 2025.

WHEREFORE, the Parties respectfully request that the Court enter an Order continuing the stay of this case until May 9, 2025, and award such other and further relief as this Court deems just.

DATED: April 21, 2025

/s/ Eric M. Phillips

Eric M. Phillips
Ariella O. Guardi
Regina LaMonica
U.S. S.E.C.
Chicago Regional Office
175 West Jackson Boulevard, Suite 1450
Chicago, IL 60604
Telephone: (312) 353-7390
Email: phillipse@sec.gov

Counsel for Plaintiff

/s/ M. Jonathan Seibald

Helgi C. Walker*
Brian A. Richman*
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Ave. NW
Washington, DC 20036
Telephone: (202) 955-8500
Email: hwalker@gibsondunn.com

Marshall R. King*
M. Jonathan Seibald*
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-2440
Email: bgoldsmith@gibsondunn.com

Michael J. Diver
Elliott M. Bacon
KATTEN MUCHIN ROSENMAN LLP
525 West Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Email: Michael.diver@kattenlaw.com

Counsel for Defendants

* *Pro hac vice*